

# **Exhibit E**

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**From:** Madigan, Sarah M. <[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>  
**Sent:** Friday, August 18, 2023 4:16 PM  
**To:** Smith, Andrew C.; Jennifer Blecher  
**Cc:** Sant, Geoffrey; Lee, Carol; Ray, III, Hugh M.; Amiad Kushner; Xintong Zhang; Wang, Fangwei  
**Subject:** RE: Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership, et al. v. Qin, No. 21-cv-9221-KPF – Mr. Qin's Cell Phones

Counsel,

Searching Qin's phones would have taken only a few hours but for the fact that we do not have Qin's Gmail password. Without it, we cannot access certain data stored on the phone or in the cloud. In response to the message Tony sent from Qin's phone last night, we received two potential passwords from Kevin, neither of which work. A number ending in 86 is one of the ways the Gmail account can be verified so that we can access the account by changing the password. Our IT expert has identified the number ending in 86 as Emma Duo Liu's. We ask that you coordinate with her, or her counsel Angus Ni ([angus@afnlegal.com](mailto:angus@afnlegal.com)), to set a time when Emma will be ready, willing, and able to respond when our vendor pings Emma's device (the phone with the number ending in 86) for verification. Our vendor's contact information is: Tino Kyprianou, [tkyprianou@setecinvestigations.com](mailto:tkyprianou@setecinvestigations.com).

When reviewing both of Qin's phones, our vendor also identified an additional Gmail account, [Sinuosimingham@gmail.com](mailto:Sinuosimingham@gmail.com), as well as a second iCloud account, [ginhui198@icloud.com](mailto:ginhui198@icloud.com). Neither of these accounts has previously been disclosed to us in response to our multiple requests for Qin's contact information. What are the passwords for these accounts?

Until our vendor is able to access both Gmail accounts and the second iCloud account, he will retain the phones.

Regarding a protocol, it is premature to discuss any protocol before we have all of the access information.

Regards,  
Sarah

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**From:** Smith, Andrew C. <[andrew.smith@pillsburylaw.com](mailto:andrew.smith@pillsburylaw.com)>  
**Sent:** Friday, August 18, 2023 4:06 PM  
**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>  
**Cc:** Sant, Geoffrey <[geoffrey.sant@pillsburylaw.com](mailto:geoffrey.sant@pillsburylaw.com)>; Lee, Carol <[carol.lee@pillsburylaw.com](mailto:carol.lee@pillsburylaw.com)>; Ray, III, Hugh M. <[hugh.ray@pillsburylaw.com](mailto:hugh.ray@pillsburylaw.com)>; Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>; Xintong Zhang <[xzhang@seidenlaw.com](mailto:xzhang@seidenlaw.com)>; Madigan, Sarah M. <[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>; Wang, Fangwei <[fangwei.wang@pillsburylaw.com](mailto:fangwei.wang@pillsburylaw.com)>  
**Subject:** Re: Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership, et al. v. Qin, No. 21-cv-9221-KPF – Mr. Qin's Cell Phones

Jennifer,

I note that you did not copy the two Pillsbury attorneys who attended the device collection. I am copying them here. One of them will respond before 4:30 pm.

Sincerely,  
Andy

Sent from my iPhone

**Andrew C. Smith | Partner**

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On Aug 18, 2023, at 4:00 PM, Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)> wrote:

Counsel,

We have still received no response regarding the status of Mr. Qin's phone, notwithstanding that he fully complied with the Court's order and notwithstanding representations made to the Court that the imaging process would only take a few hours and that the phone would be returned to him today. Mr. Qin needs his phone to, among other things, contact his children, who are currently out of the country. Both phones have been in your vendor's possession for 20 hours and it has been five hours since we inquired about its status. If we do not receive a response indicating the status as well as the time and place of return of the phone by 4:30 p.m., we will be reaching out to the Court for further relief.

- Jennifer

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**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Date:** Friday, August 18, 2023 at 10:58 AM

**To:** Sant, Geoffrey <[geoffrey.sant@pillsburylaw.com](mailto:geoffrey.sant@pillsburylaw.com)>, Lee, Carol <[carol.lee@pillsburylaw.com](mailto:carol.lee@pillsburylaw.com)>, Ray, III, Hugh M. <[hugh.ray@pillsburylaw.com](mailto:hugh.ray@pillsburylaw.com)>, Smith, Andrew C. <[andrew.smith@pillsburylaw.com](mailto:andrew.smith@pillsburylaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Xintong Zhang <[xzhang@seidenlaw.com](mailto:xzhang@seidenlaw.com)>

**Subject:** Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership, et al. v. Qin, No. 21-cv-9221-KPF – Mr. Qin's Cell Phones

Counsel,

I write to confirm that yesterday, Mr. Qin's Chinese cell phone was taken into possession by a third-party vendor during the Court hearing and that his U.S. cell phone was handed over to the vendor without incident last night at the Seiden Law office in your presence, as well as to follow up on the status of both phones. The vendor had stated that it would only take a few hours to image those phones and that they would then be returned to Mr. Qin. Please provide us with the vendor's contact information and let us know when we can expect to receive the phones back.

Separately, our position is that the data from those phones should not be searched until the parties have met and conferred regarding an appropriate protocol that would respect any issues related to

attorney-client or other applicable privilege or protection. Please let us know your availability for a call to discuss that issue.

Regards,

Jennifer

**Jennifer Blecher, Esq.**

*Senior Counsel*



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